#### **UNITED STATES DISTRICT COURT**

MIDDLE DISTRICT OF ALABAMA
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### NOTICE OF CORRECTION

From: Clerk's Office

Case Style: Williams v. State of Alabama Department of Transportation et al

**Case Number: 2:06-cv-00658-ID** 

Referenced Pleading: Evid Submission - Doc. 15

This Notice of Correction was filed in the referenced case this date to correct the PDF documents attached to this notice. Please see the correct PDF documents to this notice.

# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

LEROY WILLIAMS,	)
Plaintiff,	) )
v.	)
STATE OF ALABAMA DEPARTMENT OF TRANSPORTATION, JOE MCINNES,	) CASE NO. 2:06-cv-658-ID
etc.,	)
Defendants.	) )

# <u>DEFENDANTS' EVIDENTIARY SUBMISSION IN SUPPORT OF</u> <u>MOTION FOR SUMMARY JUDGMENT</u>

COME NOW Defendants, the State of Alabama Department of Transportation and Joe McInnes, by and through their undersigned counsel, and submit the following evidentiary materials in support of their Motion for Summary Judgment and Memorandum Brief, filed contemporaneously herewith:

**Excerpts from the Deposition of Leroy Williams** 

**Affidavit of Don Arkle** 

**Affidavit of William Adams** 

**Affidavit of Joe Jones** 

**Affidavit of Thomas Lewis** 

**Affidavit of Ron Green** 

#### **EXHIBITS**

- **A.** Form 11-Seasonal Laborer dated 10/8/92
- B. Application for Examination-Highway Maintenance Technician I
- C. Certificate of Eligibles
- D. Application for Examination-Highway Maintenance Technician II

- E. Form 4-Provisional Appointment-Engineering Assistant I
- F. Employee Performance Appraisal dated 2/14/97
- G. Employee Performance Appraisal dated 2/13/98
- H. Position Classification Questionnaire dated 11/26/01
- I. Complaint Form dated April 1997
- J. Employee Performance Appraisal dated 2/19/02
- K. Complaint From dated 10/5/00
- L. Letter dated 1/23/03 withdrawing Grievance No.736
- M. Attendance/Punctuality Guidelines dated 2/22/05
- N. Letter dated 5/12/05-appointment to Transportation Technologist.
- O. Leroy Williams resume
- P. Position Classification Questionnaire dated 5/25/05
- Q. Reprimand for Repeated Tardiness dated 7/26/05
- R. Counseling Session Memorandum dated 7/28/05
- S. Driving Time confirmation Memorandum dated 8/4/05
- T. Reprimand for Insubordination dated 8/11/05
- U. Recommendation for Discipline dated 8/15/05
- V. Memorandum to Don T. Arkle dated 8/19/05
- W. Memorandum to Ron Green dated 8/22/05
- X. Letter to Williams dated 9/1/50 termination probation
- Y. E.E.O.C. Charge of Discrimination
- Z. Complaint Form
- AA. State Personnel Announcement-Transportation Technologist
- BB. Computer printouts of Training for employees

RESPECTFULLY SUBMITTED TROY KING ATTORNEY GENERAL

s/ Andrew W. Redd
Jim R. Ippolito, Jr. (IPP001)
Assistant Attorney General
Chief Counsel

Andrew W. Redd (RED001) R. Mitchell Alton, III (ALT003) Assistant Attorneys General Assistant Counsel

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etc.,	)
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## **CERTIFICATE OF SERVICE**

I hereby certify that, on <u>March</u> <u>26</u>, <u>2007</u>, I electronically filed the foregoing with the Clerk of the Court using the CM/ECT system, which will send notification to the following:

Mr. Russell W. Adams, Esq.
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s/ Andrew W. Redd
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